

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**IN RE:**

**TERI G. GALARDI,**

**Reorganized Debtor.**

**THOMAS T. MCCLENDON, AS  
LIQUIDATING TRUSTEE OF THE  
GALARDI CREDITORS TRUST,**

**Movant,**

**v.**

**ASTRID E. GABBE,**

**Respondent.**

**CHAPTER 11**

**CASE NO. 22-50035-JPS**

**CONTESTED MATTER**

**NOTICE OF OBJECTION TO CLAIM**

THOMAS T. MCCLENDON, AS LIQUIDATING TRUSTEE OF THE GALARDI CREDITORS TRUST ("LIQUIDATING TRUSTEE") HAS FILED AN OBJECTION TO YOUR CLAIM IN THIS BANKRUPTCY CASE.

**Your claim may be reduced, modified, or eliminated. You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to eliminate or change your claim, then you or your attorney shall file with the court a written response to the objection on or before **June 9, 2023**. If you are receiving this notice by mail, you may add 3 days to the response date, in accordance with FRBP 9006(f). The objection or response should be sent to:

Clerk, U.S. Bankruptcy Court  
Middle District of Georgia  
P.O. Box. 1957  
Macon, Georgia 31202  
478-752-3506

**If a response is filed, a hearing on the objection to your claim shall be held on: June 21, 2023 at 11:00 a.m. in Courtroom A at the U.S. Courthouse, 433 Cherry Street, Macon, Georgia 31201. Parties should consult the Court's website ([www.gamb.uscourts.gov](http://www.gamb.uscourts.gov)) concerning**

*whether the hearing will be in-person, telephonic, or virtual. Please refer to Administrative Order #145 for more guidance.*

If you mail your response to the Court for filing, you shall send it early enough so that the court will **receive** the response on or before the response date stated above.

Any response shall also be served on the Liquidating Trustee.

**If you or your attorneys do not take these steps, the court may decide you do not oppose the objection to your claim.**

This notice is sent by the undersigned pursuant to LBR 9004-1.

This 10<sup>th</sup> day of May, 2023.

/s/ Thomas T. McClendon  
Thomas T. McClendon  
Georgia Bar. No. 431452  
699 Piedmont Ave NE  
Atlanta, Georgia 30308  
(404) 564-9300  
[tmccclendon@joneswalden.com](mailto:tmccclendon@joneswalden.com)  
Liquidating Trustee

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**IN RE:**

**TERI G. GALARDI,**

**Reorganized Debtor.**

**THOMAS T. MCCLENDON, AS  
LIQUIDATING TRUSTEE OF THE  
GALARDI CREDITORS TRUST,**

**Movant,**

**v.**

**ASTRID E. GABBE,**

**Respondent.**

**CHAPTER 11**

**CASE NO. 22-50035-JPS**

**CONTESTED MATTER**

**LIQUIDATING TRUSTEE’S OBJECTION TO  
CLAIM NO. 105 OF ASTRID E. GABBE**

Thomas T. McClendon, as liquidating trustee of the Galardi Creditors Trust (“Liquidating Trustee”) in the above-captioned case, files this objection (“Objection”) to the claim asserted by Astrid E. Gabbe (“Respondent”) and respectfully shows this Court as follows:

**BACKGROUND**

1. On January 12, 2022 (“Petition Date”), Teri G. Galardi (“Debtor”) filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§101 et seq. (“Bankruptcy Code”), in the United States Bankruptcy Court for the Middle District of Georgia, Macon Division (“Court”).

2. On April 14, 2023, the Court entered an Order Confirming the Joint Plan of Reorganization (Doc. No. 410) (the “Confirmation Order”).

3. The Effective Date of the Plan under the Confirmation Order is April 28, 2023.

4. Pursuant to the Confirmation Order, any objection to a proof of claim classified in Class 8 shall be filed by the Liquidating Trustee on or before the 120th day after the Effective Date.

5. On March 22, 2022, Astrid E. Gabbe filed proof of claim number 105, asserting a claim for \$67,170.77 as an unsecured claim (“Claim No. 105”). A true and correct copy of Claim No. 105 is attached hereto as **Exhibit “A”**.

6. Such claim is for “contingency fee in the Claim of Jenisee Long.” Claim No. 105 at 2.

7. Claim No. 105 was classified in Class 8 of the Plan.

#### **DISCUSSION**

8. Respondent represented Jenisee Long as an unnamed class member/creditor of the Debtor in the lawsuit styled *Espinoza et al. v. Galardi*, Case No. 1:14-cv-21244, in the United States District Court for the Northern District of Florida (the “District Court”) involving violations of the Florida Minimum Wage Act, Florida Code Ann. § 448.110 (“FMWA”). As reflected in the proof of claim, Respondent asserts she represented Ms. Long on a contingency basis.

9. On March 22, 2022, Respondent filed proof of claim number 104 in the amount of \$191,916.48 as an unsecured claim (“Claim No. 104”). Such claim reflected Jenisee Long’s “Florida Minimum Wage Act Claim.” Claim No. 104 at 2. A true and correct copy of Claim No. 104 is attached hereto as **Exhibit “B”**

10. Respondent filed Claim No. 105 on March 22, 2022. Such claim reflects 35% of Ms. Long’s FMWA claim against the Debtor as filed in Claim No. 104.

11. On March 23, 2022, Jenisee Long filed proof of claim number 115 in the amount of \$383,832.96 (“Claim No. 115”). Claim No. 115 reflects the full amount of Ms. Long’s FMWA

claim against the Debtor, which would include all contingency fees due an attorney. A true and correct copy of Claim No. 115 is attached hereto as **Exhibit “C”**.

12. Respondent filed a notice of withdrawal of Claim No. 104 on February 28, 2023 (Doc. No. 307). However, Respondent did not file a notice of withdrawal of Proof of Claim No. 105.

13. Thus, Claim No. 115 (reflecting 100% of the judgment against Debtor) and Claim No. 105 (reflecting 35% of the judgment against Debtor) remain on the claims register.

14. As Respondent’s contingency fees claim would be included in the Claim No. 115 filed by Jenisee Long, Respondent’s Claim No. 105 is duplicative and should be disallowed in its entirety.

**WHEREFORE**, the Liquidating Trustee requests the following relief:

- (a) That this Objection be sustained;
- (b) That Claim No. 105 be disallowed;
- (c) That the Court awards the Liquidating Trustee such other and further relief as is just and proper.

Respectfully submitted this 10<sup>th</sup> day of May, 2023.

/s/ Thomas T. McClendon  
Thomas T. McClendon  
Georgia Bar. No. 431452  
699 Piedmont Ave NE  
Atlanta, Georgia 30308  
(404) 564-9300  
[tmccclendon@joneswalden.com](mailto:tmccclendon@joneswalden.com)  
Liquidating Trustee

# Exhibit “A”

Fill in this information to identify the case:

Debtor 1 Teri Galardi  
Debtor 2  
(Spouse, if filing)  
United States Bankruptcy Court Middle District of Georgia  
Case number: 22-50035

FILED  
U.S. Bankruptcy Court  
Middle District of Georgia  
3/22/2022  
Kyle George, Clerk

Official Form 410  
Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	Astrid E. Gabbe Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
3. Where should notices and payments to the creditor be sent?	<b>Where should notices to the creditor be sent?</b> Astrid E. Gabbe Name P.O. Box 4216 Hollywood, FL 33083 Contact phone 9543039882 Contact email astridgabbe@gmail.com Uniform claim identifier for electronic payments in chapter 13 (if you use one):	<b>Where should payments to the creditor be sent? (if different)</b> Name Contact phone Contact email
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?	

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim?	\$ 67170.77 <b>Does this amount include interest or other charges?</b> <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information.  Contingency Fee in the Claim of Jenisee Long
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. <b>Nature of property:</b> <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b> _____  Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  <b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)  <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____ <b>Annual Interest Rate</b> (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<input checked="" type="checkbox"/> No	
	<input type="checkbox"/> Yes. Check all that apply:	Amount entitled to priority
A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.	<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ _____
	<input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
	<input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
	<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
	<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
	<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies	\$ _____
* Amounts are subject to adjustment on 4/1/22 and every 3 years after that for cases begun on or after the date of adjustment.		

### Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- ☒ I am the creditor.  
☐ I am the creditor's attorney or authorized agent.  
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.  
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 3/22/2022  
 MM / DD / YYYY

/s/ Astrid E. Gabbe  
 \_\_\_\_\_  
 Signature

Print the name of the person who is completing and signing this claim:

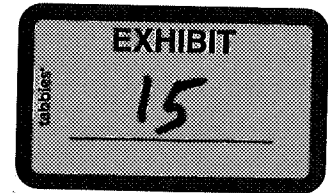
Name	<u>Astrid E. Gabbe</u>		
	First name	Middle name	Last name
Title	<u>Attorney</u>		
Company	<u>The Law Office of Astrid E. Gabbe</u>		
	Identify the corporate servicer as the company if the authorized agent is a servicer		
Address	<u>P.O. Box 4216</u>		
	Number	Street	
	<u>Hollywood, FL 33083</u>		
	City	State	ZIP Code
Contact phone	<u>9543039882</u>	Email	<u>astridgabbe@gmail.com</u>



July 30, 2019

By E-Mail and USPS Certified Mail  
Fly Low, Inc  
MBJG Corp, Inc.  
LVA Management and Consulting, Inc.  
Teri L. Galardi

c/o Dean R. Fuchs, Esq.  
Schulten, Ward, Turner & Weiss, LLP  
260 Peachtree Street N.W.  
Atlanta, Ga., 30303



Re: **Pre-Suit Notice: Jenisse Long v. Fly Low, Inc. Et al Pursuant to Florida Code §448.110**

Dear Dean:

I write to you as attorney for the above referenced entities and individuals pursuant to Florida Code Ann. §448.110(6)(a).

The purpose of my letter is to advise you of certain legal claims which my client intends to initiate against her “employers” (i.e, the entities and persons identified above) under the Florida Minimum Wage Act, Florida Code Ann. §448.110 (“FMWA”). Specifically, Ms. Long claims that her employers committed willful violations of the Act by failing to pay her minimum wages required under the FMWA, and by extracting unlawful kickbacks.

Ms. Long was employed as a Dancer-Entertainer at the King ff Diamonds from 2012 until 2018. She possesses no time records documenting the dates/times that she worked and can therefore offer only an approximation concerning the number of hours and shifts she worked. We currently estimate that she worked an average of six shifts and 32 hours per week. She was also required to pay to or on behalf of the Club “house fees” of between an average of \$125 per shift, plus an additional 10% of the amounts she earned during each shift (average of \$50 per shift) She was also required to “tip-out” Club personnel such as the Housemom, Security, and DJ (average of \$50 per shift).

Ms. Long was an un-named class member in the case of Espinoza et al v. Galardi et al, No. 1:14-cv-21244 (N.D. Fl), in which FMWA claims are being pressed as a Rule 23 class action. Espinoza was filed on April 8, 2014. Her FMWA claims, therefore, have been “tolled” since that time. Willful violations of the FMWA are subject to a five-year statute of limitations. Based on materials that have been previously provided to me in the matter of Geter et. al v

*Attorneys licensed in Georgia and Maryland*

Galardi South Inc et al., Ms. Long agreed to arbitrate her claims under the AAA Employment Rules that your clients drafted. We will be filing a demand for arbitration within thirty (30) days of receipt of this notice.

**2012**

48 weeks x 7.67 /hr 6 days a week at 8 hours per shift

Regular hours 2304 x 7.67/hr= \$17,671.68.

Fees 48 weeks x 6 shifts/wk (\$50 house fee, \$100 10%, \$50 housemom, dj security)=288 x 200=\$57,600

**2013**

48 weeks x 7.79/hr 6 days a week at 8 hours per shift

Regular hours-2304 x 7.79=\$17,948.16

Fees 48 weeks x 6 shifts/wk (\$50 house fee, \$100 10%, \$50 housemom, dj security)= 288 x200=\$57,600

**2014**

26 weeks x 7.93/hr 6 days a week at 8 hours per shift

Regular hours 1248 x 7.93/hr=9,896.64

Fees- 26 weeks x 6 shifts/wk (\$50 house fee, \$100 10%, \$50 housemom, dj security)=156 shifts x 200= \$31,200

**TOTAL WAGES: \$45,516.48**

**TOTAL DAMAGES: \$191,916.48**

Obviously, this figure does not take into account your clients' potential liability for liquidated damages and attorney's fees.

Pursuant to §448.110, your clients are entitled to 15 calendar days in which to resolve this matter by agreement. Should they fail to do so, Ms. Long will initiate the appropriate legal proceedings.

Very Truly Yours,

THE RICHARDS LAW GROUP, LLC

By: /s/Mutepe Akemon

Mutepe Akemon

# Exhibit “B”

**Fill in this information to identify the case:**

Debtor 1	Teri Galardi
Debtor 2	
(Spouse, if filing)	
United States Bankruptcy Court	Middle District of Georgia
Case number:	22-50035

**FILED**  
 U.S. Bankruptcy Court  
 Middle District of Georgia  
 3/22/2022  
 Kyle George, Clerk

**Official Form 410**  
**Proof of Claim**

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Jenisee Long Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor	
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
<b>3. Where should notices and payments to the creditor be sent?</b>	<b>Where should notices to the creditor be sent?</b> Jenisee Long Name c/o Astrid Evelyn Gabbe, Esq. P.O. Box 4216 Hollywood, FL 33083 Contact phone 9543039882 Contact email astridgabbe@gmail.com Uniform claim identifier for electronic payments in chapter 13 (if you use one):	<b>Where should payments to the creditor be sent? (if different)</b> Name Contact phone Contact email
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?	

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____										
7. How much is the claim?	\$ 191916.48 <div style="float: right; text-align: right;"> <b>Does this amount include interest or other charges?</b>  <input checked="" type="checkbox"/> No  <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).                 </div>										
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information.  Florida Minimum Wage Act Claim										
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. <b>Nature of property:</b> <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b> _____  Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  <table style="width: 100%;"> <tr> <td style="width: 50%;">Value of property:</td> <td style="width: 50%;">\$ _____</td> </tr> <tr> <td>Amount of the claim that is secured:</td> <td>\$ _____</td> </tr> <tr> <td>Amount of the claim that is unsecured:</td> <td>\$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)</td> </tr> </table> <table style="width: 100%;"> <tr> <td style="width: 60%;">Amount necessary to cure any default as of the date of the petition:</td> <td style="width: 40%;">\$ _____</td> </tr> </table> <table style="width: 100%;"> <tr> <td style="width: 60%;">Annual Interest Rate (when case was filed)</td> <td style="width: 40%;">_____ %</td> </tr> </table> <input type="checkbox"/> Fixed <input type="checkbox"/> Variable	Value of property:	\$ _____	Amount of the claim that is secured:	\$ _____	Amount of the claim that is unsecured:	\$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)	Amount necessary to cure any default as of the date of the petition:	\$ _____	Annual Interest Rate (when case was filed)	_____ %
Value of property:	\$ _____										
Amount of the claim that is secured:	\$ _____										
Amount of the claim that is unsecured:	\$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)										
Amount necessary to cure any default as of the date of the petition:	\$ _____										
Annual Interest Rate (when case was filed)	_____ %										
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____										
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____										

<b>12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check all that apply.</i>	<p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p> <p><input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____</p> <p><input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____</p> <p><input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____</p> <p><input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____</p> <p><input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____</p> <p><input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies \$ _____</p> <p style="font-size: small;">* Amounts are subject to adjustment on 4/1/22 and every 3 years after that for cases begun on or after the date of adjustment.</p>	<b>Amount entitled to priority</b>
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### Part 3: Sign Below

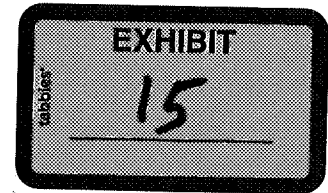
<p><b>The person completing this proof of claim must sign and date it. FRBP 9011(b).</b></p> <p>If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.</p> <p><b>A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.</b></p>	<p>Check the appropriate box:</p> <p><input type="checkbox"/> I am the creditor.</p> <p><input checked="" type="checkbox"/> I am the creditor's attorney or authorized agent.</p> <p><input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.</p> <p><input type="checkbox"/> I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.</p> <p>I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.</p> <p>I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.</p> <p>I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on date <u>3/22/2022</u></p> <p style="text-align: center;">MM / DD / YYYY</p> <p><u>/s/ Astrid E. Gabbe</u></p> <p>Signature</p> <p>Print the name of the person who is completing and signing this claim:</p> <table style="width: 100%;"> <tr> <td style="width: 20%;">Name</td> <td>Astrid E. Gabbe</td> </tr> <tr> <td></td> <td>First name Middle name Last name</td> </tr> <tr> <td>Title</td> <td>Attorney</td> </tr> <tr> <td>Company</td> <td>The Law Office of Astrid E. Gabbe</td> </tr> <tr> <td></td> <td>Identify the corporate servicer as the company if the authorized agent is a servicer</td> </tr> <tr> <td>Address</td> <td>P.O. Box 4216</td> </tr> <tr> <td></td> <td>Number Street</td> </tr> <tr> <td></td> <td>Hollywood, FL 33083</td> </tr> <tr> <td></td> <td>City State ZIP Code</td> </tr> <tr> <td>Contact phone</td> <td>9543039882</td> </tr> <tr> <td>Email</td> <td>astridgabbe@gmail.com</td> </tr> </table>	Name	Astrid E. Gabbe		First name Middle name Last name	Title	Attorney	Company	The Law Office of Astrid E. Gabbe		Identify the corporate servicer as the company if the authorized agent is a servicer	Address	P.O. Box 4216		Number Street		Hollywood, FL 33083		City State ZIP Code	Contact phone	9543039882	Email	astridgabbe@gmail.com
Name	Astrid E. Gabbe																						
	First name Middle name Last name																						
Title	Attorney																						
Company	The Law Office of Astrid E. Gabbe																						
	Identify the corporate servicer as the company if the authorized agent is a servicer																						
Address	P.O. Box 4216																						
	Number Street																						
	Hollywood, FL 33083																						
	City State ZIP Code																						
Contact phone	9543039882																						
Email	astridgabbe@gmail.com																						



July 30, 2019

By E-Mail and USPS Certified Mail  
Fly Low, Inc  
MBJG Corp, Inc.  
LVA Management and Consulting, Inc.  
Teri L. Galardi

c/o Dean R. Fuchs, Esq.  
Schulten, Ward, Turner & Weiss, LLP  
260 Peachtree Street N.W.  
Atlanta, Ga., 30303



Re: **Pre-Suit Notice: Jenisse Long v. Fly Low, Inc. *Et al* Pursuant to Florida Code §448.110**

Dear Dean:

I write to you as attorney for the above referenced entities and individuals pursuant to Florida Code Ann. §448.110(6)(a).

The purpose of my letter is to advise you of certain legal claims which my client intends to initiate against her “employers” (i.e, the entities and persons identified above) under the Florida Minimum Wage Act, Florida Code Ann. §448.110 (“FMWA”). Specifically, Ms. Long claims that her employers committed willful violations of the Act by failing to pay her minimum wages required under the FMWA, and by extracting unlawful kickbacks.

Ms. Long was employed as a Dancer-Entertainer at the King ff Diamonds from 2012 until 2018. She possesses no time records documenting the dates/times that she worked and can therefore offer only an approximation concerning the number of hours and shifts she worked. We currently estimate that she worked an average of six shifts and 32 hours per week. She was also required to pay to or on behalf of the Club “house fees” of between an average of \$125 per shift, plus an additional 10% of the amounts she earned during each shift (average of \$50 per shift) She was also required to “tip-out” Club personnel such as the Housemom, Security, and DJ (average of \$50 per shift).

Ms. Long was an un-named class member in the case of Espinoza et al v. Galardi et al, No. 1:14-cv-21244 (N.D. Fl), in which FMWA claims are being pressed as a Rule 23 class action. Espinoza was filed on April 8, 2014. Her FMWA claims, therefore, have been “tolled” since that time. Willful violations of the FMWA are subject to a five-year statute of limitations. Based on materials that have been previously provided to me in the matter of Geter et. al v

*Attorneys licensed in Georgia and Maryland*



Galardi South Inc et al., Ms. Long agreed to arbitrate her claims under the AAA Employment Rules that your clients drafted. We will be filing a demand for arbitration within thirty (30) days of receipt of this notice.

**2012**

48 weeks x 7.67 /hr 6 days a week at 8 hours per shift

Regular hours 2304 x 7.67/hr= \$17,671.68.

Fees 48 weeks x 6 shifts/wk (\$50 house fee, \$100 10%, \$50 housemom, dj security)=288 x 200=\$57,600

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48 weeks x 7.79/hr 6 days a week at 8 hours per shift

Regular hours-2304 x 7.79=\$17,948.16

Fees 48 weeks x 6 shifts/wk (\$50 house fee, \$100 10%, \$50 housemom, dj security)= 288 x200=\$57,600

**2014**

26 weeks x 7.93/hr 6 days a week at 8 hours per shift

Regular hours 1248 x 7.93/hr=9,896.64

Fees- 26 weeks x 6 shifts/wk (\$50 house fee, \$100 10%, \$50 housemom, dj security)=156 shifts x 200= \$31,200

**TOTAL WAGES: \$45,516.48**

**TOTAL DAMAGES: \$191,916.48**

Obviously, this figure does not take into account your clients' potential liability for liquidated damages and attorney's fees.

Pursuant to §448.110, your clients are entitled to 15 calendar days in which to resolve this matter by agreement. Should they fail to do so, Ms. Long will initiate the appropriate legal proceedings.

Very Truly Yours,

THE RICHARDS LAW GROUP, LLC

By: /s/Mutepe Akemon

Mutepe Akemon

# Exhibit “C”

**Fill in this information to identify the case:**

Debtor 1	Teri Galardi
Debtor 2	
(Spouse, if filing)	
United States Bankruptcy Court	Middle District of Georgia
Case number:	22-50035

**FILED**  
 U.S. Bankruptcy Court  
 Middle District of Georgia  
 3/23/2022  
 Kyle George, Clerk

**Official Form 410**  
**Proof of Claim**

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

<b>1. Who is the current creditor?</b>	Jenisee Long	
	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor	
<b>2. Has this claim been acquired from someone else?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
<b>3. Where should notices and payments to the creditor be sent?</b>	<b>Where should notices to the creditor be sent?</b> Jenisee Long Name 2107 Center Street Covington, KY 41014 Contact phone 513-551-9825 Contact email longjenisee@gmail.com Uniform claim identifier for electronic payments in chapter 13 (if you use one):	<b>Where should payments to the creditor be sent? (if different)</b> Name Contact phone Contact email
<b>4. Does this claim amend one already filed?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY	
<b>5. Do you know if anyone else has filed a proof of claim for this claim?</b>	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Who made the earlier filing? Astrid Gabbe claim #104 I fired her and she still filed the claim when she said she wouldn't	

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim?	\$ 383832.96 <b>Does this amount include interest or other charges?</b> <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information.  did not pay minimum wages at KOD and liquidated damages– former attorney would not give me my documents
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. <b>Nature of property:</b> <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410–A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b> _____  Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  <b>Value of property:</b> \$ _____  <b>Amount of the claim that is secured:</b> \$ _____  <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)  <b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____  <b>Annual Interest Rate</b> (when case was filed) _____ %  <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <b>Amount necessary to cure any default as of the date of the petition.</b> \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

<b>12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check all that apply.</i>	<p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p> <p><input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____</p> <p><input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____</p> <p><input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____</p> <p><input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____</p> <p><input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____</p> <p><input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies \$ _____</p>	<b>Amount entitled to priority</b>
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\* Amounts are subject to adjustment on 4/1/22 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

<p><b>The person completing this proof of claim must sign and date it. FRBP 9011(b).</b></p> <p>If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.</p> <p><b>A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.</b></p>	<p>Check the appropriate box:</p> <p><input checked="" type="checkbox"/> I am the creditor.</p> <p><input type="checkbox"/> I am the creditor's attorney or authorized agent.</p> <p><input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.</p> <p><input type="checkbox"/> I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.</p> <p>I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.</p> <p>I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.</p> <p>I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on date <u>3/23/2022</u></p> <p style="text-align: center;">MM / DD / YYYY</p> <p><u>/s/ Jenisee Long</u></p> <p>Signature</p> <p>Print the name of the person who is completing and signing this claim:</p> <p>Name <u>Jenisee Long</u></p> <p style="text-align: center;">First name      Middle name      Last name</p> <p>Title _____</p> <p>Company _____</p> <p>Address _____</p> <p style="text-align: center;">Identify the corporate servicer as the company if the authorized agent is a servicer</p> <p style="text-align: center;">Number Street</p> <p style="text-align: center;">, _____</p> <p style="text-align: center;">City State ZIP Code</p> <p>Contact phone _____ Email _____</p>
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P.O. Box 360295  
Decatur, Georgia 30036  
www.RichardsLegal.com  
Office: 404.289.6816  
Fax: 404.795.0727

July 30, 2019

By E-Mail and USPS Certified Mail  
Fly Low, Inc  
MBJG Corp, Inc.  
LVA Management and Consulting, Inc.  
Teri L. Galardi

c/o Dean R. Fuchs, Esq.  
Schulten, Ward, Turner & Weiss, LLP  
260 Peachtree Street N.W.  
Atlanta, Ga., 30303

Re: **Pre-Suit Notice: Jenisse Long v. Fly Low, Inc. *Et al* Pursuant to Florida Code §448.110**

Dear Dean:

I write to you as attorney for the above referenced entities and individuals pursuant to Florida Code Ann. §448.110(6)(a).

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*Attorneys licensed in Georgia and Maryland*

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Obviously, this figure does not take into account your clients' potential liability for liquidated damages and attorney's fees.

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Very Truly Yours,

THE RICHARDS LAW GROUP, LLC

By: /s/Mutepe Akemon  
Mutepe Akemon

From: **Astrid E. Gabbe** <[astridgabbe@aol.com](mailto:astridgabbe@aol.com)>  
Date: Sun, Mar 13, 2022 at 7:52 PM  
Subject: Re:  
To: <[longjenisee@gmail.com](mailto:longjenisee@gmail.com)>

Ms Long,

Please be advised that there are three deadlines in the bankruptcy case.

Neither I nor Mr. Dudley will file anything for you.

1. File proof of claim March 23, 2022
2. Objection to discharge April 1, 2022
3. Objection to subchapter 5 March 18, 2022

Please have your attorney contact me and we will send you this individual all information needed.

Sincerely,,

Astrid E. Gabbe  
The Law Office of Astrid E. Gabbe, P.A.  
P.O. Box 4216  
Hollywood, FL, 33083  
954-303-9882

This message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information that is exempt from public disclosure. Any unauthorized review, use, disclosure, or distribution is prohibited. If you have received this e-mail message and are not the intended recipient, please contact the sender (by phone or reply e-mail )and destroy all copies of the original message. Sent from [AOL Desktop](#)

In a message dated 3/13/2022 10:39:40 AM Eastern Standard Time,  
[longjenisee@gmail.com](mailto:longjenisee@gmail.com) writes:

Ms Gabbe I need my client file to give to another lawyer. Please send it to me by email as soon as possible. and how much do I owe out of my settlement to your law firm?





From: **Ainsworth Dudley** <[adudleylaw@gmail.com](mailto:adudleylaw@gmail.com)>  
Date: Fri, Mar 18, 2022 at 9:06 AM  
Subject: Re:  
To: jenisee long <[longjenisee@gmail.com](mailto:longjenisee@gmail.com)>

Ms. Long:

I received your termination letter, and will take no further action on your case. As I have indicated to you earlier, you are personally responsible for filing your proof of claim with the bankruptcy court by the deadline. If you miss the deadline, your claim will be barred.

If you need to speak with Ms. Gabbe, direct communications to her not me.

No one has filed any "false claims" on behalf of anyone.

Thank you.

**Ainsworth G. Dudley**  
**4200 Northside Parkway**  
**Building 1, Suite 200**  
**Atlanta, GA 30327**  
**404.687.8205**

On Thu, Mar 17, 2022 at 4:07 PM jenisee long <[longjenisee@gmail.com](mailto:longjenisee@gmail.com)> wrote:

Hey I'm just clarifying that you (Astrid )and Dubley are fired and no longer on my case . I heard you guys are filing false Claims against the other clients , if I find out anything is being claimed under my name I will pursue legal actions between you and Dubley .

From: **jenisee long** <[longjenisee@gmail.com](mailto:longjenisee@gmail.com)>

Date: Tue, Mar 22, 2022 at 1:19 PM

Subject:

To: <[astridgabbe@aol.com](mailto:astridgabbe@aol.com)>

why would you file my bankruptcy papers as my attorney when I fired you ?

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**IN RE:**

**TERI G. GALARDI,**

**Reorganized Debtor.**

**THOMAS T. MCCLENDON, AS  
LIQUIDATING TRUSTEE OF THE  
GALARDI CREDITORS TRUST,**

**Movant,**

**v.**

**ASTRID E. GABBE,**

**Respondent.**

**CHAPTER 11**

**CASE NO. 22-50035-JPS**

**CONTESTED MATTER**

**CERTIFICATE OF SERVICE**

This is to certify that I have on this day electronically filed the foregoing *Debtor's Objection to Claim of Astrid E. Gabbe* (the "Objection") using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Objection to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Michael Akemon** mutepe.akemon@richardslegal.com
- **Ainsworth G Dudley** adudleylaw@gmail.com
- **Evan Owens Durkovic** ecfgamb@aldridgepite.com, edurkovic@ecf.courtdrive.com
- **Robert G. Fenimore** robert.g.fenimore@usdoj.gov, Ustp.region21.mc.ecf@usdoj.gov
- **Will Bussell Geer** wgeer@rlkglaw.com, notices@nextchapterbk.com; willgeer@ecf.courtdrive.com;2836@notices.nextchapterbk.com;6717577420@filings.cketbird.com;geer.willb117921@notify.bestcase.com;emiller@rlkglaw.com
- **Whitney Warnke Groff** wgroff@law.ga.gov
- **Elizabeth A. Hardy** elizabeth.a.hardy@usdoj.gov, Ustp.region21.mc.ecf@usdoj.gov; elizabeth.hardy.collins@usdoj.gov
- **Brian K. Jordan** ecfgamb@aldridgepite.com, bjordan@ecf.courtdrive.com
- **Christina T. Lanier** christina.t.lanier@usdoj.gov, southern.taxcivil@usdoj.gov
- **Jonathan Loegel** jonathan@loegel.com

- **Roy E. Manoll** kdd@fbglaw.com
- **Louis G. McBryan** lmc Bryan@mcbryanlaw.com, alepage@mcbryanlaw.com
- **Garrett A. Nail** gnail@pgnlaw.com
- **James D. Silver** jsilver@kklaw.com, raldama@kklaw.com
- **Ward Stone** wstone@stoneandbaxter.com, lford@stoneandbaxter.com; mcathey@stoneandbaxter.com; dbury@stoneandbaxter.com; lchapman@stoneandbaxter.com; amoses@stoneandbaxter.com
- **Christopher W. Terry** chris@boyerterry.com, terrycr40028@notify.bestcase.com
- **U.S. Trustee - MAC** Ustp.region21.mc.ecf@usdoj.gov

I further certify that I served a true and correct copy of the foregoing Objection on all parties referenced below via United States First Class Mail, postage prepaid:

Astrid E. Gabbe  
The Law Office of Astrid E. Gabbe P.A.  
P.O. Box 4216  
Hollywood, FL 33083

This 10<sup>th</sup> day of May, 2023.

/s/ Thomas T. McClendon

Thomas T. McClendon

Georgia Bar. No. 431452

699 Piedmont Ave NE

Atlanta, Georgia 30308

(404) 564-9300

[tmccclendon@joneswalden.com](mailto:tmccclendon@joneswalden.com)

Liquidating Trustee